

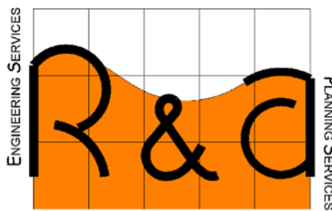
Modification Application

Site Plan Review (SP-18-02)

Prepared for:

Linn Economic Development Group
C/O Don Waddell
321 1st Avenue E, Suite 3a
Albany, Oregon 97321

Prepared by:



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November 29, 2021

Project Summary

Request:	Application for approval of a Minor Modification to alter the office location and parking area layout approved by Site Plan Review (SP18-02).
Location:	3251 NE Old Salem Road Albany, Oregon 97321 Linn County Assessor's Map No. 10s03w28, Tax Lot 400
Applicant:	Linn Economic Development Group C/O Don Waddell 321 1 st Avenue E, Suite 3a Albany, Oregon 97321 Phone: 503-319-5099 Email: wadsie@hotmail.com
Owner:	Albany-Millersburg Economic Development Corporation C/O John Pascone 435 1 st Avenue W Albany, Oregon 97321 Phone: 541-926-1519 Email: pasconj@peak.org
Engineer/Planner:	Reece & associates, Inc. 321 1 st Avenue Suite 3A Albany OR 97321 541-926-2428 Engineer: David J. Reece, PE Planner: Hayden Wooton dave@r-aengineering.com haydenw@r-aengineering.com

Exhibits:

- A – SP18-02 Notice of Decision
- B – Linn County Assessor's Map No. 10s03w28

Plan Set:

- 1.0 – Cover Sheet
- 2.0 – Existing Site Conditions
- 3.0 – Site Modification Plan
- 4.0 – Office Landscape Plan

I. Project Description

Linn Economic Development Group (LEDG), hereafter referred to as “the applicant,” is proposing to modify an approved site development plan (SP18-02) (Exhibit A). The original site plan review application proposed construction of a truck-to-rail/rail-to-truck intermodal facility on Linn County Assessor’s Map No. 10s03w28, tax lot 400 (Exhibit B). Along with intermodal improvements, the application included a proposal to renovate an existing office building and its associated parking area. That plan was approved with conditions by the City of Millersburg Planning Commission on April 16th, 2019. Although the original approval was only valid for a period of two (2) years from the date of the decision notice (Published April 17th, 2019), the land use approval was vested on March 11th, 2021, when the applicant began construction.

Instead of renovating the existing office building and parking facilities, this site plan review modification application proposes to construct a new 960-square-foot office building and seven parking stalls. The existing office and parking areas will be denoted as “not for use.” As such, no improvements or renovations will be made to this area. The new office building and parking will be designed to comply with the appropriate standards in the City of Millersburg Development Code (MDC).

Applications for a Site Plan Review Modification are processed as either a Type III, Major Modification; Type II, Minor Modification; or a Type I, Minor Modification. There are several thresholds listed in MDC 5.16.060(3)(a) through (f) that determine if an application is Major Modification. These thresholds are:

- a. *A change in land use, from a less intensive use to a more intensive use, as evidenced by parking, paved area, an estimated increase in automobile or truck trips (peak and/or average daily trips), an increase in hours of operation, an increased demand for parking, additional paved area or similar factors, where the increase is 10 percent or more, provided the standards of Article II and Article III are met;*
- b. *A reduction in required setbacks, or an increase in coverage, by 10 percent or more, provided the standards of Article II and Article III are met;*
- c. *A change in the type and/or location of vehicle access points or approaches, driveways, or parking areas affecting off-site traffic when the roadway authority determines the change could cause a significant adverse impact on traffic operations or safety;*
- d. *A reduction to screening, or a reduction to the area reserved for common open space or landscaping by 10 percent or more;*
- e. *Change to a condition of approval, or a change similar to subsection a-d, above, that could have a detrimental impact on adjoining properties. The City Manager shall have discretion in determining detrimental impacts triggering a major modification; or*
- f. *Other changes similar to those subsections a-e, above, in scale, magnitude, or impact to adjacent properties, as determined by the City Manager.*

First, this application falls beneath these thresholds because it does not include a change in land use, an increase in average daily vehicle trips, an increase in hours of operations, an increase in parking demand, or an increase in paved area. The site will continue to function as initially proposed. Second, the proposed building will be setback approximately 518 feet from the subject property’s frontage along Old Salem Road. Third, vehicle access points, parking areas, or driveways do not impact off-site traffic circulation on

Old Salem Road. Access points and turning movements will remain identical to the original application. Forth, there will be no reduction in screening or common open space. Finally, this modification does not propose to change a condition of approval or another significant change similar to those listed in MDC 5.16.060(2)(a) through (f) that would have a detrimental impact on adjoining properties. Therefore, this Site Plan Review Modification application will be considered a minor modification.

There is one criterion for a minor modification, MDC 5.16.060(8), which requires: *“The Planning Director, or the Planning Commission in the case of an appeal of a Type II decision, shall approval, deny, or approve with conditions an application for minor modification based on findings of compliance or noncompliance with the applicable requirement of the Development Code and the conditions of approval of the original decision.”* The applicant has provided findings of fact demonstrating compliance with this criterion in the following sections of this burden of proof.

II. Conditions of Approval

As required by MDC 5.16.060(8), the proposed modification must be in compliance with the conditions of approval associated with the original decision.

1) *This land use approval shall substantially comply with the submitted preliminary site plans included as Exhibit C, except as indicated in the following conditions. Additional development or change of use may require a new development application and approval.*

With the exception of the proposed modifications and alterations necessary to satisfy these conditions of approval, development will occur in substantial conformance with the original approval. Because the proposed modifications do not include additional development or a change of use, this application does not conflict with this condition.

2) *Copies of any required federal or state permits that may be required shall be filed in the Record File of this application.*

The proposed modification does not prevent the applicant or operator from providing copies of any required federal or state permits to City of Millersburg staff. Furthermore, the proposed modification does not alter any of these approvals.

3) *All required public improvement plans shall be approved by the City prior to beginning construction. All utilities shall remain uncovered until inspected and approved by the City. All required public improvements shall be completed and approved by the City prior to construction.*

The proposed modification will not alter the placement of public utilities. The applicant submitted Private Construction of Public Infrastructure (PCPI) plans on November 16th, 2021, for construction of a waterline connection in Old Salem Road. Once construction of these improvements begins, the contractor will notice city staff and leave all utilities uncovered until inspected and approved by city staff. Therefore, this condition has already been addressed and the construction team will continue to comply with this condition.

4) *All new construction of public infrastructure, including roads, water, sewer, and storm drainage, must be submitted for review and approval by the City of Millersburg through a Private Construction of Public Infrastructure (PCPI) permit. All work within the public right-of-way shall be designed by a licensed engineer and performed by a licensed contractor in conformance with the Albany Standard Construction*

Specifications as adopted by the City of Millersburg or the Linn County requirements where within the Old Salem Road right-of-way. The plans shall be in substantial conformance with the tentative map and demonstrate the placement of all existing and proposed utilities underground.

The proposed modification does not affect the construction of public improvements. As previously mentioned PCPI plans were submitted to city staff and approved. This approval serves as an acknowledgement that proposed public infrastructure has been designed by a licensed engineering, will be performed by a licensed contract, and is in conformance with the Albany Standard Construction Specifications.

5) Any public utilities required to serve the site must be constructed by the applicant and accepted by the City. Any lines crossing Old Salem Road must conform to Linn County requirements. All portions of water, sewer, or stormwater utilities construction within public road right-of-ways shall be public.

The proposed modification does not affect the construction of public utilities. A waterline connection will cross Old Salem Road. This improvement was submitted and approved under the previously mentioned PCPI plans.

6) Applicant is required to construct a sidewalk or path along the eastern side of Old Salem Road, consistent with the City of Millersburg Transportation System Plan (TSP).

The City of Millersburg has opted to waive this condition; therefore, it is not relevant to the proposed modification.

7) Any required street signage and street lighting shall be approved by the City Engineer and installed.

The proposed modification does not include any additional street signage or street lighting.

8) All agreements required as conditions of this approval must be signed and recorded.

Any agreements required as conditions of approval will be signed and recorded regardless of the location of the proposed office building and parking area.

9) Install or replace, to Linn County specifications, all sidewalks, curb ramps, or driveways which are damaged, deteriorated, or removed by construction along Old Salem Road frontage.

If during construction of the proposed improvements any sidewalks, curb ramps, or driveways are damaged, deteriorated, or removed, they will be replaced according to Linn County specifications. Therefore, the proposed modification will comply with this condition.

10) Proposed landscape buffers may not be adequate to address all noise concerns. Applicant shall conduct a post construction noise study to demonstrate there are no noise impacts of concern to the City at the interface between the residential and industrial zone caused by this project. Additional noise mitigation measures may be required.

Because construction of the proposed improvements, modified or existing, has not been completed yet, this condition does not apply at this time. It will be enforced after the site is operational.

11) *As recommended by the traffic study, any future project within the undeveloped area near Arnold Lane must relocate the passenger vehicle access currently located to the north of the truck queuing area along Old Salem Road such that the access aligns with Arnold Lane.*

The proposed modifications are not located near Arnold Lane; therefore, this condition does not apply.

12) *All users of the site shall comply with all local, State and Federal rules, regulations and standards for noise and air quality.*

Regardless of the proposed modification, the eventual facilities operator will need to comply with all local, state, and federal regulations relating to noise and air quality.

13) *Prior to the issuance of building or grading permits the applicant shall provide a wetland delineation study and concurrence form the Department of State Lands, to the satisfaction of the City Engineer. The City Engineer has the ability to waive this requirement.*

The applicant submitted a copy of a wetland delineation study and concurrence form from the Department of State Lands on March 16th, 2021. The proposed modification does not affect these documents.

14) *Prior to the issuance of any building permits, the applicant shall submit full, detailed landscape plans for staff review. Said landscape plans shall fully conform with all provisions of Section 5.134 including street trees and parking area landscaping.*

A landscape plan was submitted to city staff; it received approval. The proposed modification will alter parking lot landscaping. Please refer to the applicant's response to MDC 2.10.060(5) for more information.

15) *Prior to the issuance of any building permits, the applicant shall submit full, detailed lighting plans and lighting schedules (cut sheets) for staff review. Said lighting plans shall fully conform with all provisions of Section 5.135.*

A lighting plan was submitted to city staff and was approved. Lighting specific to the proposed modification is addressed later in this application narrative. Please refer to the applicant's response to MDC 3.03.080(4) for more information.

16) *Prior to issuance of building permits, the applicant shall submit for review and approval a revised site plan showing the following:*

A Shared Use Path/Trail shall be added to the site plan, to the satisfaction of the City Planner, that shows a trail spanning the improved property along Old Salem Road, consistent with the Transportation System Plan.

The City of Millersburg has opted to waive this condition; therefore, it is not relevant to the proposed modification.

17) *The applicant shall provide an operations plan for City Staff review. The operations plan shall contain, at a minimum,*

a. the planned procedures for the maximum height of the stacked shipping containers,

- b. *the maximum truck idling times at all locations throughout the site,*
- c. *the security details for the site, including fencing, staff, hours, and lighting details, and details regarding the traffic patterns planned, including planned truck routes that will be required by the applicant for all users of the facility.*

The plan shall be to the satisfaction of the City Planner and the City Engineer.

The applicant has not yet provided a complete operations plan. While this modification is not expected to alter site operations, the plan will account for any changes when it is submitted.

18) *The applicant's engineer is required to provide a site-specific drainage plan to temporarily collect, route, and treat surface water and ground water during each construction phase. The construction plans shall specifically identify how the storm drainage system and erosion sediment control measures will be phased during construction, such that at any time during construction the approved plans shall be capable of provide full erosion and sediment control, collection, routing, and treatment of stormwater runoff and ground water. No site construction will be allowed to take place if the storm drainage system and erosion sediment control measures are not installed per plan and functioning properly.*

The applicant's engineer, Reece & Associates, Inc., submitted a site-specific drainage plan as a portion of an application for a Millersburg Grading permit. The proposed modification does not include alterations to the approved stormwater management systems.

19) *Obtain a 1200C Erosion Control Permit for all the disturbed ground, both on and offsite that is in excess of one acre in addition to meeting all Albany Construction Standards (ACS). The applicant shall follow the latest requirements from the Department of Environmental Quality (DEQ) for NPDES 1200-C Permit submittals. A copy of the approved and signed permit shall be provided to the City prior to any ground disturbing activities.*

The applicant obtained a 1200-C Construction Stormwater General permit and sent a copy to city staff on March 16th, 2021. The proposed modification does not alter erosion control measures and is within the boundaries of the permit area.

20) *Applicant shall design stormwater detention facilities as required to meet city standards. Stormwater calculations shall be submitted to the City Engineer for review and approval. If applicable, design stormwater detention basins per the criteria in the City of Albany Engineering Standards E.8.00 – Stormwater Detention, except "City of Albany" shall be replaced with "City of Millersburg." Maintenance of detention basin shall be the responsibility of the applicant.*

A City of Millersburg Grading permit was approved on September 29th, 2020. This approval indicates the proposed stormwater facilities comply with the design criteria in the City of Albany Engineering Standards E.8.00 – Stormwater Detention. The proposed modification will not affect the approved stormwater detention facilities.

21) *Stormwater from the southern part of the project area discharges to Murder Creek. Stormwater from the northern portion of the project area discharges to an unnamed tributary of Murder Creek that flows beneath Old Salem Road. Applicant shall be responsible for any required industrial stormwater discharge permits.*

The eventual facilities operator will be responsible for obtain any required industrial stormwater discharge permits. The proposed modification does not relieve the operator of this requirement.

22) *Prior to occupancy of the overnight parking area shall have signs posted that express the local, State and Federal idling limits. The number of signs and size of the signs shall meet the satisfaction of the City Planner.*

Prior to occupancy of overnight parking areas, the applicant shall post signs that express the local, state, and federal idling limits. The applicant will submit information describing these signs to city staff prior to installation. The modification does not proposal to alter this condition or the overnight parking requirements. Therefore, the applicant will comply with this condition when it is applicable.

23) *Prior to occupancy the applicant shall construct the Shared Use Path/Trail as required by the City's TSP.*

The City of Millersburg has opted to waive this condition; therefore, it is not relevant to the proposed modification.

24) *Prior to occupancy, pursuant to a recommendation from the traffic study and ODOT, the intersection of Old Salem Road and Century Road shall be reconfigured to a traditional geometry and control. The revisions will eliminate northbound left turning trucks from blocking southbound traffic and eastbound left turning trucks from blocking northbound left turning vehicles. The recommended intersection control and configuration is illustrated in the traffic study on Figure 16. ODOT or the City can waive this requirement.*

The proposed modification will not affect improvements to the intersection of Old Salem Road and Century Road. This striping will still occur prior to occupancy.

25) *All required landscaping shall be installed prior to occupancy.*

All landscaping whether approved through this modification or the original landscaping plan will be installed prior to occupancy.

26) *Prior to occupancy the applicant shall provide a clearance letter form the Albany Fire Department indicating all items listed in their January 4, 2019 letter have been satisfied. Specifically, the following noted items must be addressed:*

a. *The Fire Department has reviewed the above project for conformance to the 2014 Oregon Fire Code (OFC) per your request and has the following comments:*

i. *All newly constructed building 50,000 square feet in size or larger shall have approved radio coverage for emergency responders within the building based upon the existing coverage levels of the Albany Police and Fire Departments' communication systems the exterior of the building [see OFC Appendix J].*

ii. *Commercial developments which exceed three stories or 30' in height or have a gross building area of more than 62,000 square feet shall be provided with at least 2 means of fire apparatus access. These access points shall be remotely separated by at least ½ the length of the maximum overall diagonal dimension of the property or area served.*

Exception: Projects having a gross building area of up to 124,000 square feet that have a single approved fire apparatus access road when all buildings are equipped throughout with approved automatic sprinkler systems.

- iii. *Approved fire apparatus roadways must extend to within 150 feet of all exterior portions of any structure that will be built on the property as measured by an approved route of travel around the exterior of the structure.*
- iv. *Dead-end fire apparatus roads in excess of 150 in length shall be provided with an approved area for turning around fire apparatus.*
- b. *This proposed project is located within a "Protected Area" as defined by Oregon Fire Code (OFC) Appendix B, Section B102, and this area is currently served by a public water system. The fire flow required for shall be as specified in Appendix B of the Fire Code.*
- c. *The location and spacing requirements for fire hydrants are based on four project-specific criteria:*
 - i. *The distance from the most remote exterior point of the building(s) to the closest available fire hydrant.*
 - ii. *The calculated "fire flow" of the proposed building(s).*
 - iii. *The spacing of the existing fire hydrants along the public and private fire apparatus roads serving the property.*
 - iv. *The location of new required public or private fire apparatus access roads located adjacent to the proposed building(s) to be constructed.*
- d. *The requirements for fire hydrants for this proposed project will be based on the following requirements:*
 - i. *Fire hydrant location: All portions of buildings constructed or moved into the City shall be located within 400 feet (600 feet for fire sprinkler-protected buildings) of a fire hydrant located on a fire apparatus access road using an approved route of travel.*
 - ii. *Required hydrants based on the required fire flow as calculated in accordance with OFC 503.7 and OFC Appendix B. The minimum number of fire hydrants is determined by OFC Table C105.1.*
 - iii. *Required fire hydrant spacing will be based upon applicant's required fire flows as determined by OFC Appendix C105.1 and Tale C105.1. Please note that dead end roads require a reduced spacing.*
 - iv. *Fire hydrant spacing along new/required fire apparatus access roads. In addition, OFC Section C103.1 requires the placement of additional hydrant along all of applicant's required fire access roads that are adjacent to any proposed building (and any future additions) and circulating through applicant's private property with spacing requirements per Appendix C 105.1.*

Prior to occupancy, the applicant will provide a clearance letter from the City of Albany Fire Department indicating all items listed in their January 4th, 2019, letter have been satisfied. This condition will apply to the proposed modification because it will not be enforced until occupancy.

27) *Within 6 months of starting operations of the facility, the applicant shall provide staff with a noise study showing that noise level measurements emitting from the standard operations of the facility, at the nearest residential properties both inside the City, and outside the City (across I-5), are acceptable pursuant to Ordinance No. 94.*

Site operations have not begun, and this condition will remain in effect until the applicant has provided city staff with a noise study demonstrating that noise levels generated by this facility are within the boundaries of Ordinance No. 94 when measured from the nearest residential properties. Compliance with this condition will not be affected by the proposed modification.

III. General Industrial Zone Development Standards

As required by MDC 5.16.060(8), the proposed modification must be in compliance with the applicable development standards.

[2.10.050] *Dimensional Standards. Unless otherwise permitted in this Code, the following minimum dimensional standards shall be required for all development in the GI zone.*

The subject property is zoned General Industrial by the City of Millersburg. This zoning district outlines two dimensional standards that govern the proposed modification. First, there is a 20-foot setback for Yards Adjacent to Old Salem Road. The proposed office building will be located approximately 518 feet from the subject property's Old Salem Road frontage. Second, there is a maximum lot coverage standard of 100 percent. The proposed modification does not increase the project's lot coverage. Therefore, the modification complies with these dimensional standards.

[2.10.060(1)] *Off-Street Parking. Parking, Driveway, and loading improvements shall comply with provisions in Chapter 3.03.*

The proposed modification will construct a new parking area to serve the new office building. The following standards in Chapter 3.03 are applicable to this modification:

[3.03.060(1)] *Vehicle Parking Spaces.*

Office buildings require "1 space per 400 sq. ft. of gross floor area, plus 1 space per 2 employees." The proposed office building will require a total of seven spaces. Two spaces are required to account for its gross floor area of 960 square feet, and five spaces to required for the 10 expected employees. Therefore, this standard is met.

[3.03.060(2)] *Bicycle Spaces.*

Bicycle parking spaces will be provided adjacent to the entrance of the proposed office building. These spaces will be sheltered by an awning extending from the front façade of the office building. Lighting will be provided by a wall light intended to illuminate the entrance. Therefore, this standard is met.

[3.03.080(1)] *Surfacing.*

All proposed parking stalls will be paved in accordance with this standard; therefore, this standard is met.

[3.03.080(2)] *Parking Spaces.*

Each proposed parking stall will be 20 feet long and 9 feet wide. Therefore, this standard is met.

[3.03.080(4)] *Lighting.*

A wall light located on the south building façade will illuminate the proposed parking area, and another wall light on the west building façade will illuminate the entrance and bicycle parking area. Because these lights will be located several hundred feet from the nearest

public right-of-way, they will not cast glare onto moving vehicles or residential areas. Therefore, this standard is met.

[2.10.060(2)] *Signs. Signs in the GI zone shall conform to the standards contained in Chapter 3.06.*

No additional signage is proposed by this modification; therefore, this standard does not apply.

[2.10.060(3)] *Yards and Lots. Yards and lots shall conform to provisions contained in Chapter 3.08.*

This proposal does not include front, side, or rear yard projections that would require compliance with MDC 3.08.030 through 3.08.050. The remaining applicable standard in Chapter 3.08 governs driveway vision clearance. The proposed modification will not alter the existing vehicle entrance-exit points, so existing vision clearance triangles are unaffected by this proposal. Therefore, this standard does not apply.

[2.10.060(4)] *Site Development Review. All new development and expansion of an existing structure or use in the General Industrial Zone shall be subject to the site development review procedures of Chapter 5.05.*

This application is for a site plan review modification; it does not include new development or expansion of an existing structure. Therefore, this standard does not apply.

[2.10.060(5)] *Landscaping. Any required or established yard shall be landscaped with trees, shrubs, and groundcover and maintained pursuant to provisions in Chapter 3.09.*

The proposed modification will create a new parking lot that must be landscaped in accordance with MDC Chapter 3.09. The following standards from this chapter apply to the proposed improvements:

[3.09.030(2)(a)] *Planter Bays.*

Two new planter bays will be constructed on the east and west side of the new parking lot. These landscape planter bays will be 7 feet wide (excluding curb), contain one canopy tree, three shrubs, and attractive ground cover in the form of bark chips. Therefore, this standard is met.

[3.09.030(2)(b)] *Parking Space Buffers.*

The proposed parking area will be separated from the office building by a 7.5-foot-wide pedestrian walkway. Therefore, this standard is met.

[3.09.030(2)(d)] *Landscape Protection.*

Each landscape planter is separated from adjacent gravel areas by protective curbing. Therefore, this standard is met.

[2.10.060(6)] *Residential Screening. Property abutting an RL, RU, or RM zone shall be screened with a sight-obscuring fence not less than six feet in height. This requirement shall not include the front yard.*

The subject property does not abut an RL, RU, or RM zoning district. Therefore, this standard does not apply.

[2.10.060(7)] *Environmental performance standards may limit placement of certain uses in the zone if the site is located within 300 feet of residential zoned land.*

The subject property is not located within 300 feet of residentially zoned land. Therefore, this standard does not apply.

IV. Conclusion

This application narrative and accompanying site plan demonstrate that the proposed minor modification complies with Millersburg Development Code MDC 5.16.060(8) and all other applicable standards.



CITY OF MILLERSBURG, OREGON NOTICE OF DECISION

April 17, 2019

To: Applicants and Participants

RE: NOTICE OF DECISION

This notice is to inform you that the Millersburg Planning Commission, on April 16, 2019 has made a Land Use Decision concerning the following application:

Requested Action: The Mid-Willamette Valley Intermodal Transfer Center (File No. SP 18-02) applicant is proposing a facility that would transfer rail contents in shipping containers to trucks and from trucks to rail.

Action Taken: The Planning Commission approved the application with a unanimous vote of all Commissioners present.

Applicant/Owner: Linn Economic Group
435 First Avenue West
Albany OR, 97321

Property Location: 3160, 3251, and 3435 NE Old Salem Road

Assessor Map: 10 3W 28 Tax Lot 100, 108, 400

Zoning: General Industrial (GI)

The Planning Commission approved the site plan review with conditions. No Commissioners recused themselves. No other ex-parte or conflicts from the Planning Commission were presented except for some site visits.

The decision will not become final until the period for filing a local appeal has expired. An action or ruling from the Planning Commission pursuant to Millersburg Code may be appealed to the City Council within 15 days after the Planning Commission has rendered its decision. If the appeal is not filed within the 15-day period, the decision of the Planning Commission shall be final. A complete copy of the record including the application, staff report and all documents and evidence relied upon by the Planning Commission in making their decision are available for inspection at the Millersburg City Hall at no cost. The City Hall is located at 4222 Old Salem Road, Millersburg, Oregon.

Written notice of an appeal shall be filed with the City. If the appeal is filed, the City Council shall hold a public hearing on the appeal. A party aggrieved by

the City Council final determination in a proceeding for a land use decision or limited land use decision may have the determination reviewed by the Land Use Board of Appeals (LUBA). A notice of intent to appeal a land use decision shall be filed not later than 21 days after the date the notice of decision is made.

Failure of an issue to be raised at the City's review or hearing, in person or by letter, or failure to provide sufficient detail to afford the decision maker an opportunity to respond to the issue precludes appeal to the Land Use Board of Appeals (LUBA) based on that issue.

For additional information feel free to contact call me at 541-928-4523 or mstraite@cityofmillersburg.org.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Matt Straite", with a stylized flourish at the end.

Matt Straite,
City Planner

